



Louisville Metro Air Pollution Control District  
850 Barret Avenue  
Louisville, Kentucky 40204-1745



Permit No.: 37071-13-C

Plant ID: 0852

Effective Date: x/xx/2013

Expiration Date: x/xx/2014

Permit Fee: \$0,000

University of Louisville, Belknap Campus  
2301 S Brook St.  
Louisville, KY 40208

is authorized to install the described process equipment by the Louisville Metro Air Pollution Control District. Authorization is based on information provided with the application submitted by the company and in accordance with applicable regulations and the conditions specified herein.

Process equipment description:

One (1) Theatre Arts Spray Booth for aerosol can spray paint or RIT dye application to stage production clothing, shoes, and jewelry, ventilating rate 8000 cfm, equipped with a 0.625 MMBtu/hr direct natural gas heater and a fiber filter (C11 – S8). This unit will be designated as U11 – E40.

Applicable Regulation(s): 2.03, 5.00, 5.01, 5.14, 5.20, 5.21, 5.22, 5.23, 7.08, 7.25

Choose reference(s): N/A

Application No. 36963

Application Received: 2/20/2013

Permit Writer: Yiqiu Lin

Date of Public Comment 03/23/2013

{Manager1}  
Air Pollution Control Officer  
{date1}

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of applicable fees is not made after receipt of the statement of fees (SOF). The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

### **General Conditions**

- G1. The owner or operator of the affected facility covered by this permit shall notify the District of any process change, equipment change, material change, or change in method or hours of operation. This requirement is applicable to those changes that may have the potential for increasing the emission of air contaminants to a level in excess of the applicable limits or standards specified in this permit or District regulations.
- G2. The owner or operator shall obtain new or revised permits from the District when:  
(See [District Regulation 2.16](#) for Title V sources. See [District Regulation 2.17](#) for FEDOOP sources. See [District Regulation 2.03](#) for other sources.)
- a. The company relocates to a different physical address.
  - b. The ownership of the company is changed.
  - c. The name of the company as shown on the permit is changed.
  - d. Permits are nearing expiration or have expired.
- G3. The owner or operator shall submit a timely application for changes according to G2. For minor sources only, the District does not require application for permit renewal. The District automatically commences the process of permit renewal for minor sources upon expiration. Timely renewal is not always achievable; therefore, the company is hereby authorized to continue operation in compliance with the latest District permit(s) until the District issues the renewed permit(s).
- G4. The owner or operator shall not be authorized to transfer ownership or responsibility of the permit. The District may transfer permits after appropriate notification ([Form 100A](#)) has been received and review has been made.
- G5. The owner or operator shall pay the required permit fees within 45 days after issuance of the SOF by the District, unless other arrangements have been proposed and accepted by the District.

- G6. This permit allows operation 8,760 hours per year unless specifically limited elsewhere in this permit.
- G7. The owner or operator shall submit emission inventory reports as required by [Regulation 1.06](#).
- G8. The owner or operator shall timely report abnormal conditions or operational changes, which may cause excess emissions as required by [Regulation 1.07](#).
- G9. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
- G10. If a change in the "Responsible Official" (RO) occurs during the term of this permit, the owner or operator shall provide written notification ([Form 100A](#)) to the District within 30 calendar days of the date the RO change occurs.

**Specific Conditions****S1. Standards** (Regulation 2.03, section 5.1)**a. VOC**

The owner or operator shall not allow or cause plantwide VOC emissions, including all coatings, additives, catalysts, solvents, thinners, and cleaners from all affected facilities subject to Regulation 7.25, including this unit, lithographic presses (U5), and groundwater remediation system (U10), to equal or exceed 5 tons during any 12 consecutive month period, unless a BACT is submitted and approved by the District. (Regulation 7.25, section 2.1 and 3.1)

**b. Opacity**

The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. (Regulation 7.08, section 3.1.1)

**c. PM**

The owner or operator shall not allow PM emissions to exceed 2.34 lb/hr. (Regulation 7.08, section 3.1.2) (See Comment 1)

**d. TAC**

The owner or operator shall not allow emissions of any TAC to exceed environmentally acceptable (EA) levels, whether specifically established by modeling or determined by the District to be de minimis. (Regulations 5.00 and 5.21) (See Comment 2)

**S2. Monitoring and Record Keeping** (Regulation 2.03, section 5.1)

The owner or operator shall maintain the required records for a minimum of 5 years and make the records readily available to the District upon request.

**a. VOC**

- i. The owner or operator shall, monthly, record the total amount used in gallons of each coating, solvent, cleaner, etc. and calculate the amount of VOC containing material used during the 12 consecutive month period.
- ii. The owner or operator shall, monthly, calculate the VOC emissions during the 12 consecutive month period to demonstrate compliance with Specific Condition S1.a.

**b. Opacity**

- i. The owner or operator shall inspect the filters in the paint booth monthly to ensure proper installment (i.e. proper alignment/placement, gaps, etc.) and replace as needed.
- ii. The owner or operator shall keep a record that shows the date and the name of the person who inspected the filters and if filters were replaced.

**c. PM**

See Specific Condition S2.b.

**d. TAC**

- i. The owner or operator shall maintain records sufficient to demonstrate environmental acceptability, including, but not limited to MSDS, analysis of emissions, and/or modeling results.
- ii. The owner or operator shall re-evaluate the environmental acceptability and document the environmentally acceptable emissions if a new TAC is introduced or the content of a TAC in a raw material increases.

**S3. Reporting (Regulation 2.03, section 5.1)**

The owner or operator shall submit semi-annual compliance reports that include the information in this section. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement. The compliance reports shall be postmarked within 60 days following the end of each reporting period. All compliance reports shall include the following certification statement per Regulation 2.16, section 3.5.11.

- "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete"
- Signature and title of company responsible official.

The compliance reports are due on or before the following dates of each calendar year:

<u>Reporting Period</u>	<u>Report Due Date</u>
January 1 <sup>st</sup> through June 30 <sup>th</sup>	August 29 <sup>th</sup>
July 1 <sup>st</sup> through December 31 <sup>st</sup>	March 1 <sup>st</sup>

a. **VOC**

The owner or operator shall include, at a minimum, the following information in the semi-annual compliance monitoring reports for Regulation 7.25:

- i. Emission Unit ID number and emission point or stack ID number;
- ii. The beginning and ending date of the reporting period; and
- iii. Total VOC emissions during twelve consecutive months for each month from all affected facilities subject to Regulation 7.25, including this unit, lithographic presses (U5), and groundwater remediation system (U10).

b. **Opacity**

- i. Any deviation from the requirement to perform the required monthly visual inspections of the paint booth PM filter system; and
- ii. Any deviation from the requirement to record the results of each paint booth PM filter system inspection.

c. **PM**

See Specific Condition S3.b.

d. **TAC**

- i. The owner or operator shall report any conditions that were inconsistent with those conditions analyzed in the most recent Environmental Acceptability Demonstration or a negative declaration stating that operations were within the conditions analyzed. This includes, but is not limited to, control device upset conditions.
- ii. For any conditions outside the analysis, the owner or operator shall re-analyze to determine whether these conditions comply with the STAR program. Changes to the air dispersion modeling program or meteorological data used in the most recent Environmental Acceptability Demonstration do not trigger the requirement to re-analyze. (Regulation 5.21 sections 4.22 – 4.24)
- iii. The owner or operator shall submit the re-evaluated EA demonstration to the District within 6 months of a change of a raw material as described in S2.d.ii.

### **Comments**

1. A one-time PM compliance demonstration has been performed for this equipment and the lb/hr standard cannot be exceeded uncontrolled. Therefore, there are no monitoring, record keeping, and reporting requirements with respect to PM lb/hr emission limits.
2. It was demonstrated that the TAC emissions from the paint booth are de minimis uncontrolled and TAC emissions from the natural gas heater are de minimis per definition (Regulation 5.21, section 2.7). Therefore the facility is in compliance with STAR Program.
3. The construction permit fees are based on allowable emissions of less than 5 tons per year of VOC in accordance with Regulation 2.08, section 2.5.1.10.